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July 27, 2018

## **VIA ECF AND HAND DELIVERY**

The Honorable Judge George B. Daniels 500 Pearl Street Room 1310 New York, NY 10007

Re: Asia TV USA Ltd. et al. v. Dibia Networks Limited, et al, Case No. 17 Civ. 6977 Letter Requesting Adjournment of Conference Scheduled for August 1, 2018

## Dear Judge Daniels:

We represent Plaintiffs Asia TV USA Ltd., MSM Asia Ltd., Star India Private Ltd., Viacom18 Media Private Limited, ARY Digital USA, and DISH Network L.L.C. (collectively "Plaintiffs") in the above-captioned action (the "Action"). Today, on July 27, 2018, we received a call from your Clerk, regarding whether the status conference scheduled for August 1, 2018 should proceed on that date or be adjourned. Pursuant to that conversation, we write to request that the Court adjourn the status conference scheduled in this Action for an additional month, at which time the parties can be heard on the default judgment motion, which Plaintiffs anticipate filing no later than August 15, 2018. We further write to confirm that we have not received any communications from Defendants regarding this Action, and Defendants remain in default.

This letter constitutes Plaintiffs' fifth request for an adjournment in this Action. The prior requests for adjournment of the conferences were granted on November 30, 2017, April 11, 2018, May 17, 2018 and June 22, 2018. As Defendants have not contacted Plaintiffs and are in default in this Action, Plaintiffs have not been able to obtain the consent of Defendants to this request for an adjournment. If, however, Plaintiffs' request is granted, we will promptly serve the Court's order adjourning the conference on Defendants.

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Respectfully yours,

**Davis Wright Tremaine LLP** 

/s/ Lacy Herman Koonce, III

Lacy Herman Koonce, III

cc: Dibia Networks Limited (via hand delivery) Abdellah Hamead (via email to Hamead and hand delivery on Dibia)